

Message

From: Villanueva, Philip [Villanueva.Philip@epa.gov]
Sent: 12/11/2020 1:34:14 PM
To: Miller, David [Miller.DavidJ@epa.gov]
Subject: RE: aldicarb NMC

Yes, just the cumulative. I think Mike wants us to stay away from any discussion or comparison to the single-chemical.

From: Miller, David <Miller.DavidJ@epa.gov>
Sent: Friday, December 11, 2020 8:31 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>
Subject: FW: aldicarb NMC

Where does this happen? Just our cumulative? Or also in the single chem.

Recall, we covered this way back when and all decided that assuming zeroes for <LOD was fine for the cumulative. Because of its nature. And we told folks that.

David

From: Metzger, Michael <Metzger.Michael@epa.gov>
Sent: Friday, December 11, 2020 7:54 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Cc: Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

Ex. 5 Deliberative Process (DP)

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Friday, December 11, 2020 7:49 AM
To: Metzger, Michael <Metzger.Michael@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Cc: Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

Hi Mike,

I'm fine with cutting the rationale back. We may want the last sentence of the first paragraph (about PCT) as well if additional rationale is needed. I included the information about the indicator since that was the quick and easy approach we discussed a few weeks back for determining the impact of adding aldicarb citrus back into the cumulative. Not sure if you were at that meeting. Anyhow, taking that part out makes sense if the language is going in the docket. The exercise gave me confidence that there would not be much of an impact. Of course, you managers make the final call. Just offering my thoughts.

Phil

From: Metzger, Michael <Metzger.Michael@epa.gov>
Sent: Friday, December 11, 2020 7:36 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Cc: Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

Thanks, Phil. My thought is that the first 4 sentences is all we need. I think we should be taking the focus off of cumulative to the extent we can; discussing differences between the single chemical and the cumulative will only confuse people outside of HED and focus more scrutiny on it during the comment period. Thoughts?

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Thursday, December 10, 2020 5:07 PM
To: Vogel, Dana <Vogel.Dana@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Cc: Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

Hi Folks,

Let me know what you think of this draft. Thinking it was for a briefing, I included information about the draft toxicity-adjusted dietary index for the NMCs since Alex had been briefed on this before. If this is going in the docket, you may just want to strip out the dietary index piece.

Phil

From: Vogel, Dana <Vogel.Dana@epa.gov>
Sent: Thursday, December 10, 2020 4:23 PM
To: Metzger, Michael <Metzger.Michael@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

Yes, that sounds like the right way to go!

Thx,

Dv

From: Metzger, Michael <Metzger.Michael@epa.gov>
Sent: Thursday, December 10, 2020 2:44 PM
To: Wilbur, Donald <Wilbur.Donald@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

I think 1 page or shorter. I think the justification includes (1) already included citrus in the previous cumulative, (2) didn't incorporate PCT into the assessment so revised PCT won't change results, (3) are there others? Amy and team are putting something together for DW.

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Thursday, December 10, 2020 2:28 PM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

Thanks Phil!

I apologize that I wasn't clear about this 😊 – we need a 1-page memo to explain why this new use will not impact the NMC CRA that will likely be included in the docket with the aldicarb assessment (subject to RD input). Can you work on incorporating these bullets into a few paragraphs?

Thanks,
Don

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From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Thursday, December 10, 2020 2:14 PM
To: Wilbur, Donald <Wilbur.Donald@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Nako, Steve <Nako.Steve@epa.gov>
Subject: RE: aldicarb NMC

Dana and Don,

Please find attached a one-pager (front and back 😊) that characterizes the impact of aldicarb use on citrus in the 2007 NMC CRA. It also characterizes the impact of adding the highest years of PDP data on orange, orange juices, and grapefruit to the toxicity-adjusted dietary Report on the Environment (ROE) indicator. Exposure at the 99.9th percentile for children 1-2 years old was minimal. We also include some comparison of the tox endpoint and safety/uncertainty factors between the CRA and single-chemical assessment and mention the sensitivity of ½ LOD exposure estimates based on the historically high PCT values and low single-chemical endpoint. Finally, attached is also an article from Scientific American in 2010 about the aldicarb cancellation. We thought it would be good for the front office to be aware of any political blowback that might result from any regulatory decisions for aldicarb. I'll wait for your go ahead to share with EFED. Let me know if you have any questions. I'm happy to walk you through it.

Phil

From: Villanueva, Philip
Sent: Tuesday, December 08, 2020 2:10 PM

To: Wilbur, Donald <Wilbur.Donald@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Yes, will do. For characterization it would be helpful to know what the tox endpoint and safety factors are for the single chemical. @Mike is this something your branch has handy?

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Tuesday, December 08, 2020 1:44 PM
To: Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Villanueva, Philip <Villanueva.Philip@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

It looks like EFED is ready to go on this now!

Phil – Do you want to reach out to Amy and start whipping up the CRA 1-pager?

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From: Vogel, Dana <Vogel.Dana@epa.gov>
Sent: Tuesday, December 8, 2020 1:34 PM
To: Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: FW: aldicarb NMC

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Tuesday, December 08, 2020 12:55 PM
To: Metzger, Michael <Metzger.Michael@epa.gov>
Cc: Matuszko, Jan <Matuszko.Jan@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Subject: aldicarb NMC

Hi,

We were able to discuss again within EFED what the inclusion of this new action for aldicarb would mean for the DWA in the NMC cumulative. We are comfortable/okay with the new action in terms of the DWA in the cumulative and are planning on writing this up (a paragraph or so). We are targeting having a draft to share by Thursday afternoon to have in time for the Alex briefing on Friday.

Let me know if you have any questions.

Amy

Amy Blankinship
Branch Chief, ERB2
USEPA – OCSPP/OPP/EFED

Ex. 6 Personal Privacy (PP)